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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRAVIS NUTSCH, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a Municipal Corporation;
OFFICER TIMOTHY NYE, an individual;
OFFICER GEORGE AJAM, an individual;
OFFICER GENE WOLFANGER, an
individual; OFFICER KELLEY FURNAS,
an individual; OFFICER ISRAEL CRUZ
CAMACHO, an individual; OFFICER
GABRIEL LEA, an individual; DOE
OFFICERS III-VII, individuals

Defendants.

Case No.: 2:23-cv-01101-JCM-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN AND
SCHEDULING ORDER DEADLINES**

(EIGHTH REQUEST)

Plaintiff Travis Nutsch, by and through his respective counsel, and Defendants Las Vegas Metropolitan Police Department, Officer Timothy Nye, Officer George Ajam, and Officer Gene Wolfanger, Officer Kelly Furnas, Officer Israel Cruz Camacho, and Officer Gabriel Lea, (“LVMPD Defendants”), by and through their respective counsel (collectively “the Parties”), hereby stipulate and agree to extend the Discovery Plan and Scheduling Order deadlines an additional ninety (90) days. This Stipulation is being entered in good faith and not for purposes of delay. This is the eighth request for an extension in this matter, as the seventh request was denied without prejudice at hearing on January 7, 2025.

1 **1. STATUS OF DISCOVERY.**

2 **A. PLAINTIFF'S DISCOVERY**

3 1. Plaintiff's Initial Disclosures and Production of Documents Pursuant to Fed.
4 R. Civ. P. 26.1, dated August 28, 2023.

5 2. Plaintiff's First Set of Requests for Production to Defendant Las Vegas
6 Metropolitan Police Department, dated October 12, 2023.

7 3. Plaintiff's First Set of Requests for Production to Defendants Doe Officers
8 III-VII, dated December 12, 2023.

9 4. Plaintiff's First Set of Requests for Production to Defendant Gabriel Lea,
10 dated December 12, 2023.

11 5. Plaintiff's First Set of Requests for Production to Defendant Gene
12 Wolfanger, dated December 12, 2023.

13 6. Plaintiff's First Set of Requests for Production to Defendant George Ajam,
14 dated December 12, 2023.

15 7. Plaintiff's First Set of Requests for Production to Defendant Israel Cruz
16 Camacho, dated December 12, 2023.

17 8. Plaintiff's First Set of Requests for Production to Defendant Kelley Furnas,
18 dated December 12, 2023.

19 9. Plaintiff's First Set of Requests for Production to Defendant Timothy Nye,
20 dated December 12, 2023.

21 10. Plaintiff's First Set of Requests for Admissions to Defendants Doe Officers
22 III-VII, dated December 12, 2023.

23 11. Plaintiff's First Set of Requests for Admissions to Defendant Gabriel Lea,
24 dated December 12, 2023.

25 12. Plaintiff's First Set of Requests for Admissions to Defendant Gene
26 Wolfanger, dated December 12, 2023.

27 13. Plaintiff's First Set of Requests for Admissions to Defendant George Ajam,
28 dated December 12, 2023.

1 14. Plaintiff's First Set of Requests for Admissions to Defendant Israel Cruz
2 Camacho, dated December 12, 2023.

3 15. Plaintiff's First Set of Requests for Admissions to Defendant Kelley Furnas,
4 dated December 12, 2023.

5 16. Plaintiff's First Set of Requests for Admissions to Defendant Timothy Nye,
6 dated December 12, 2023.

7 17. Plaintiff's First Set of Interrogatories to Defendants Doe Officers III-VII,
8 dated December 12, 2023.

9 18. Plaintiff's First Set of Interrogatories to Defendant Gabriel Lea, dated
10 December 12, 2023.

11 19. Plaintiff's First Set of Interrogatories to Defendant Gene Wolfanger, dated
12 December 12, 2023.

13 20. Plaintiff's First Set of Interrogatories to Defendant George Ajam, dated
14 December 12, 2023.

15 21. Plaintiff's First Set of Interrogatories to Defendant Israel Cruz Camacho,
16 dated December 12, 2023.

17 22. Plaintiff's First Set of Interrogatories to Defendant Kelley Furnas, dated
18 December 12, 2023.

19 23. Plaintiff's First Set of Interrogatories to Defendant Timothy Nye, dated
20 December 12, 2023.

21 24. Plaintiff's Responses to Defendant Gabriel Lea's First Set of
22 Interrogatories, dated May 29, 2024.

23 25. Plaintiff's Responses to Defendant Gene Wolfanger's First Set of
24 Interrogatories, dated May 29, 2024.

25 26. Plaintiff's Responses to Defendant George Ajam's First Set of
26 Interrogatories, dated May 29, 2024.

27 27. Plaintiff's Responses to Defendant Israel Cruz Camacho's First Set of
28 Interrogatories, dated May 29, 2024.

28. Plaintiff's Responses to Defendant Kelley Furnas's First Set of Interrogatories, dated May 29, 2024.

29. Plaintiff's Responses to Defendant Timothy Nye's First Set of Interrogatories, dated May 29, 2024.

30. Plaintiff's Responses to Defendant LVMPD's First Set of Interrogatories, dated May 29, 2024.

31. Plaintiff's Responses to Defendant LVMPD's First Set of Requests for Production of Documents, dated May 29, 2024.

B. DEFENDANTS' DISCOVERY

1. Defendants' Initial List of Witnesses and Documents Pursuant to Fed. R. Civ. P. 26.1 dated August 30, 2023.

2. Defendant LVMPD's responses to Plaintiff's First Set of Requests for Production of Documents, dated November 27, 2023.

3. Defendant Gabriel Lea's responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

4. Defendant Gene Wolfanger's responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

5. Defendant George Ajam's responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

6. Defendant Israel Cruz Camacho's responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

7. Defendant Kelly Furnas' responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

8. Defendant Timothy Nye's responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

9. Defendants Doe Officers III – VII's responses to Plaintiff's First Set of Requests for Admission, dated January 25, 2024.

1 10. Defendant Gabriel Lea's responses to Plaintiff's First Set of Requests for
2 Production of Documents, dated January 31, 2024.

3 11. Defendant George Ajam's responses to Plaintiff's First Set of Requests for
4 Production of Documents, dated January 31, 2024.

5 12. Defendant Israel Cruz Camacho's responses to Plaintiff's First Set of
6 Requests for Production of Documents, dated January 31, 2024.

7 13. Defendant Timothy Nye's responses to Plaintiff's First Set of Requests for
8 Production of Documents, dated January 31, 2024.

9 14. Defendants Doe Officers III-VII's responses to Plaintiff's First Set of
10 Requests for Production of Documents, dated January 31, 2024.

11 15. Defendant Gabriel Lea's responses to Plaintiff's First Set of Interrogatories,
12 dated January 31, 2024.

13 16. Defendant George Ajam's responses to Plaintiff's First Set of
14 Interrogatories, dated January 31, 2024.

15 17. Defendant Israel Cruz Camacho's responses to Plaintiff's First Set of
16 Interrogatories, dated January 31, 2024.

17 18. Defendant Timothy Nye's responses to Plaintiff's First Set of
18 Interrogatories, dated January 31, 2024.

19 19. Defendants Doe Officers III – VII's responses to Plaintiff's First Set of
20 Interrogatories, dated January 31, 2024.

21 20. Defendant LVMPD's First Set of Interrogatories to Plaintiff, dated February
22 9, 2024.

23 21. Defendant LVMPD's First Set of Requests for Production to Plaintiff, dated
24 February 9, 2024.

25 22. Defendant Gabriel Lea's First Set of Interrogatories to Plaintiff, dated
26 February 9, 2024.
27
28

23. Defendant Gene Wolfanger's First Set of Interrogatories to Plaintiff, dated February 9, 2024.

24. Defendant George Ajam's First Set of Interrogatories to Plaintiff, dated February 9, 2024.

25. Defendant Israel Cruz Camacho's First Set of Interrogatories to Plaintiff, dated February 9, 2024.

26. Defendant Kelly Furnas' First Set of Interrogatories to Plaintiff, dated February 9, 2024.

27. Defendant Timothy Nye's First Set of Interrogatories to Plaintiff, dated February 9, 2024.

2. DISCOVERY THAT REMAINS TO BE COMPLETED.

The Parties' primary remaining discovery tasks include: (1) addressing any remaining meet and confer issues and finishing written discovery; and (2) scheduling of depositions. As discussed at the January 7, 2025, hearing regarding this matter, counsel need to schedule the depositions of the Parties and LMVPD's person most knowledgeable regarding its policies.

3. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.

This is the eighth request for an extension of discovery deadlines in this matter. The Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional ninety (90) days so that the Parties may complete the tasks above.

Based on the foregoing stipulation and proposed deadlines plan, as well as the representations made at the January 7, 2025, hearing in this matter, the Parties thus respectfully request an extension of time to extend the discovery in this matter to enable to them to conduct necessary discovery in this matter and so that this matter is fairly resolved on the merits.

4. **PROPOSED DEPOSITION DATES**

Pursuant to this Court's request at the January 7, 2025, hearing, counsel have met and conferred, and propose the following deposition dates which will be noticed upon granting of the instant stipulation and order. Parties reserve the right to change these dates subject to deponent and counsel availability.

Deponent	Proposed Deposition Date
Defendant Timothy Nye	February 20, 2025
Defendant George Ajam	February 20, 2025
Defendant Gene Wolfanger	February 21, 2025
Defendant Kelley Furnas	February 21, 2025
Defendant Israel Cruz Camacho	March 10, 2025
Defendant Gabriel Lea	March 10, 2025
Defendant LMVPD FRCP 30(b)(6) Designee	March 11, 2025
Plaintiff Travis Nutsch	March 12, 2025

5. **PROPOSED SCHEDULE FOR REMAINING DEADLINES**

Deadline	Current Deadline (ECF No. 20)	Proposed New Deadline
Amend Pleadings and Add Parties	Passed	unchanged
Initial Expert Disclosures	Passed	unchanged
Rebuttal Expert Disclosures	Passed	unchanged
Discovery Cut-Off	February 6, 2025	May 7, 2025
Dispositive Motions	March 10, 2025	June 9, 2025 ¹
Joint Pretrial Order	April 7, 2025	July 7, 2025 ²

¹ 90 days from March 10, 2025, is June 8, 2025, a Sunday.

² 90 days from April 7, 2025, is July 6, 2025, a Sunday.

Based on the foregoing stipulation and proposed deadlines plan, the Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional ninety (90) days so that the parties may conduct necessary discovery.

IT IS SO STIPULATED.

Dated this 21st day of January, 2025.

Dated this 21st day of January, 2025.

MCLETSCHIE LAW

MARQUIS AURBACH

By: /s/ Leo S. Wolpert

By: /s/ Nick D. Crosby

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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

U.S. MAGISTRATE JUDGE
1-22-25

